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BY ECF

Hon. John F. Keenan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

November 27, 2018

**Re: *King v. Wang et. al.*, No. 14-cv-07694 (JFK-JLC)
 Wang et al. v. King et. al., No. 18-cv-08948 (JFK-JLC)**

Dear Judge Keenan:

This firm represents Yien-Koo Wang King as preliminary executrix of the Estate of Chi-Chuan Wang (“King”) in *King v. Wang et. al.* No. 14-cv-07694 (JFK-JLC) (the “Estate Action”) and we write pursuant to Your Honor’s instruction given at the pre-motion conference held earlier today. Specifically, we write to (1) note our objection that the Estate Action should not be consolidated – for discovery or any other purpose – with the proceeding captioned *Wang et al. v. King et al.*, No. 1:18-cv-08948 (JFK) (the “New RICO Action”) and (2) identify the parties Sam P. Israel, P.C. intends to represent in the New RICO Action.

First, we object to the consolidation of the two above-captioned actions for discovery and other purposes. The two pleadings do not involve the same parties, the same injuries, the same allegedly stolen paintings, the same transactions, the same witnesses, or the same evidence. In fact, the material allegations are not even alleged to have occurred during the same decade. On the one hand, the Estate Action is poised to hold Andrew and Shou-Kung Wang (the “Wangs”) personally liable to the Estate of Chi-Chuan Wang for the self-dealing of 98 Estate-owned paintings which were covertly sold by Andrew Wang (during his tenure as Estate fiduciary between 2003 and 2017) to himself and his father through the use of phony contracts. On the other hand, the New RICO Action seeks to hold Yien-Koo and her immediate family liable to the Wangs (not the Estate) for (a) thefts of *other* paintings which allegedly occurred prior to the Estate of Chi-Chuan Wang’s formation in 2003 and (b) for winning a probate trial held by the New York Surrogate’s Court in 2017. Moreover, the Estate Action has been pending for over

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four years and King is in her mid-80s. We therefore respectfully submit that given the incongruence of the claims in the two matters and King's age, consolidation of the discovery schedule will not secure any significant efficiencies and is prejudicial both to King and the estate she represents.

Second, we write in accordance with the Court's direction at the conference convened earlier today to notify Your Honor that Sam P. Israel, P.C. will represent Yien-Koo Wang King (individually), Kenneth King, and Raymond King as defendants in the New RICO Action. We will also accept service on their behalf in accordance with Fed. R. Civ. P. Rule 4. However, neither my firm nor its employees have ever had any contact with Lynn King or Joseph Shih-Fan King, the other named defendants to the New RICO Action. We are therefore not prepared to accept service on their behalf at this time.

We thank Your Honor for Your attention to the foregoing.

Respectfully submitted:

Sam P. Israel, P. C.

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cc. All Counsel of Record (*via* ECF)